FILED UNDER SEAL

Prob12C D/NV Form Rev. March 2017

United States District Court for the District of Nevada

PETITION FOR WARRANT FOR OFFENDER UNDER SUPERVISION

Name of Offender: Randy Bunnell

Case Number: <u>2:17CR00172</u>

Name of Sentencing Judicial Officer: **Honorable Jennifer A. Dorsey**

Date of Original Sentence: January 7, 2019

Original Offense: Felon in Possession of a Firearm

Original Sentence: 38 Months prison, followed by 36 Months TSR.

Date Supervision Commenced: July 18, 2022

PETITIONING THE COURT

⊠ To issue a warrant.

The probation officer believes the offender has violated the following condition(s) of supervision:

1. Report within 72 Hours – You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of you release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.

Bunnell was released from custody on July 18, 2022, and never reported to the United States Probation Office.

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2. <u>Shall Not Commit Crime</u> – You must not commit another federal state or local crime.

On or about February 19, 2023, Bunnell committed the offense of Burglary of a Business, 1st Offense, in violation of N.R.S. 205.060.1B; Fraud Use of Credit/Debit Card with Intent to Defraud, in violation of N.R.S. 205.760; Obtain/Possess Credit/Debit Card Without Cardholder's Consent, in violation of N.R.S. 205.690; and Parole Violation.

It is reported that on or about February 17, 2023, a Westgate Hotel and Casino guest's purse was stolen. On February 19, 2023, Westgate security investigators, through surveillance video, identified Bunnell as the person who stole the purse. With the assistance of the Las Vegas Metropolitan Police Department, investigation confirmed that Bunnell had possession of the purse, credit cards and had used the victim's credit cards without consent.

On April 5, 2023, in the Eight Judicial District Court, Clark County, Nevada, Bunnell entered a guilty plea to the charge of Attempt Possession of Credit or Debit Card Without Cardholder's Consent, in violation of N.R.S. 205.690, 193.153, a Category E Felony/Gross Misdemeanor, Court Case No. C-23-372173-1. Bunnell is scheduled for sentencing on May 17, 2023.

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| U.S. Probation Officer Recommendation: | | |
|--|---|---|
| The term of supervision should be: | | |
| | ⊠ Revoked | |
| | | I declare under penalty of perjury that the information contained herein is true and correct, |
| | | Executed on May 11, 2023 Digitally signed by Javier Muruato-Cortez Date: 2023.05.11 14:09:05 -07'00' |
| | | Javier Muruato United States Probation Officer |
| Appro | ved: | |
| | Digitally signed by Todd Fredlund Date: 2023.05.11 13:04:14 -07'00' | |
| Todd 1 | Fredlund | |
| Supervisory United State Probation Officer | | |
| | | |
| THE COURT ORDERS | | |
| | | |
| □ X | No Action. The issuance of a warrant. | |
| | The issuance of a summons. | |
| | Other: | |

Signature of Judicial Officer

5/12/2023

Date

RE: Randy Bunnell

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA UNITED STATES V. RANDY BUNNELL, 2:17CR00172

SUMMARY IN SUPPORT OF PETITION FOR WARRANT May 10, 2023

By way of case history, Bunnell was sentenced by your honor on January 7, 2019, to 38 months custody, to run concurrent with state case 17F08826X. Bunnell was in primary state custody at time of sentencing. Bunnell completed his federal sentence on September 17, 2021, while in the Nevada Department of Corrections (NDOC). Bunnell remained in NDOC until July 18, 2022, when he was released to parole supervision. Pursuant to 18 U.S.C. § 3624(e) a term of supervised release commences on the day the person is released from imprisonment and runs concurrently with any Federal, State, or local term of probation or supervised release or parole for another offense to which the person is subject or becomes subject during the term of supervised release. Thus, Bunnell's term of supervised release in this case commenced on July 18, 2022. Our office was never informed of his release from state custody and only learned of his release when his state parole officer contacted our office on May 10, 2023, to advise that Bunnell was in custody on new charges.

Although Bunnell failed to report to the United States Probation Office, Bunnell did report to the Nevada Department of Public Safety, Parole and Probation Office, on or about July 18, 2022, to commence his state parole supervision.

As noted in allegation #2, Bunnell committed a new law violation and has pled guilty to the offense of Attempt Possession of Credit or Debit Card Without Cardholder's Consent. He is scheduled for sentencing on May 17, 2023.

Bunnell has an extensive criminal history with the following convictions:

Receiving Known Stolen Property (April 2009)

Minor Gambling (November 2009)

Trespassing (July 2009)

Possession of Narcotics Paraphernalia (August 2009)

Driving Without a Valid Driver's License (May 2011)

Possession of Drug Not Introduced into Commerce (May 2011)

Lodging without Consent (May 2011)

Possession of Stolen Vehicle (November 2012)

Attempted Robbery (August 2011)

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Petit Larceny (September 2011) Driving Without a Valid Driver's License (July 2017) Attempted Possession of Stolen Vehicle (October 2015) Grand Larceny (March 2019)

As noted, Bunnell failed to report to the United States Probation Office upon his release from custody. Bunnell was being monitored by State parole authorities and committed a new crime while under supervision. It is respectfully requested that a warrant be issued to initiate revocation proceedings.

Respectfully submitted,

Digitally signed by Javier Muruato-Cortez Date: 2023.05.11 14:10:04 -07'00'

Javier Muruato
United States Probation Officer

Approved:

Digitally signed by Todd

Fredlund

Date: 2023.05.11 13:04:30

-07'00'

Todd Fredlund

Supervisory United States Probation Officer